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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRAGO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

v.

CHARLES SCHWAB & CO., INC., and THE
CHARLES SCHWAB CORPORATION,

Defendants.

Case No. 3:16-cv-3938-RS

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF CLASS
CERTIFICATION SCHEDULE**

Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino and named plaintiff Scott Posson (“Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The Charles Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the “Parties”), by and through their respective counsel, for good cause, hereby stipulate as follows:

WHEREAS, on April 15, 2019, the Court entered a Case Management Scheduling Order setting the case schedule through the class certification hearing (ECF No. 144), and on April 6, 2020 the Court so-ordered the Parties’ stipulation to extend the case schedule (ECF No. 150);

WHEREAS, the Parties have engaged in class certification and merits discovery and are continuing to meet and confer in good faith regarding outstanding issues;

WHEREAS, on February 5, 2020, Plaintiffs noticed a Rule 30(b)(6) deposition that was originally scheduled for May 7, 2020;

WHEREAS, on June 1, 2020, the Parties met and conferred regarding the case schedule in light of certain restrictions due to COVID-19 and in response to the Court’s May 18, 2020 Order (ECF No. 151);

WHEREAS, the Parties have agreed to re-schedule the Rule 30(b)(6) deposition for July 29, 2020 to potentially allow for an in person deposition;

WHEREAS, the current deadline for pre-class certification fact depositions is June 12, 2020, so the Parties need an extension of the current class certification deadlines to accommodate the date of this deposition;

WHEREAS, the Parties have agreed, with the Court’s approval, to modify the Case Management Scheduling Order to extend the deadlines by approximately one month for each deadline through the class certification hearing;

WHEREAS, this is the Parties’ fifth request for an extension of the deadlines in the Case Management Scheduling Order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO APPROVAL BY THIS COURT, as follows:

The deadlines through the class certification hearing shall be as follows:

Event	Deadline
Pre-class certification fact depositions	July 31, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 1, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 6, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	December 23, 2020
Expert depositions concerning class certification	January 6-20, 2021
Plaintiffs' class certification motion and <i>Daubert</i> challenges	February 15, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	April 16, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	May 5, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	May 31, 2021
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court)
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO STIPULATED.

Dated: June 22, 2020

GLANCY PRONGAY & MURRAY LLP

By: /s/ Jonathan Rotter

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1 Dated: June 22, 2020

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12
13 **ATTESTATION**

14 I, Jonathan Rotter, am the ECF User whose identification and password are being used to file
15 this Proposed Order for Extension of Class Certification Schedule. In compliance with Local Rule
16 5-1(i)(3), I hereby attest that Counsel for Defendants concur in this filing.
17

18
19 DATED: June 22, 2020

Jonathan Rotter
Jonathan Rotter

[PROPOSED] ORDER

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

Event	Deadline
Pre-class certification fact depositions	July 31, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	September 1, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	November 6, 2020
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Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court)
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO ORDERED.

DATED: _____

Hon. Richard Seeborg
U.S. District Court Judge

PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case and am over eighteen years old. On June 22, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Northern District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 22, 2020, at Los Angeles, California.

s/ Jonathan Rotter
Jonathan Rotter